

Theresa Rice

From: Diane Berry on behalf of PCD
Sent: Thursday, February 02, 2012 9:47 AM
To: Kathy Cook; Ryan Ericson; Theresa Rice
Subject: FW: Attn Ryan Ericson -- SMP Vegetation Management and Environmental Impacts (Jan 12, 2012)

Libby was copied on original email.

From: Lee Cross [mailto:lee.s.cross@gmail.com]
Sent: Thursday, February 02, 2012 8:52 AM
To: PCD
Cc: Libby Hudson; Perry Barrett; Terry Lande; Ken Dewitt; Kirk Robinson; Tom Swolgaard; Jay Kinney; bdrecords@biparks.org
Subject: Attn Ryan Ericson -- SMP Vegetation Management and Environmental Impacts (Jan 12, 2012)

Dear Planning Commission --

The Park District has reviewed the Jan. 12 materials scheduled to be discussed at the Planning Commission on Feb. 2, 2012. We noticed several changes relevant to parks in the draft sections on Vegetation Management (4.1.3) and Environmental Impacts (4.1.2). We have several comments and concerns about those changes.

- **Changes in Vegetation Alteration Standards -- Public Park Development**

The Park District is very concerned with the new language in Section 4.1.3.10 Vegetation Alteration Standards -- Public Park Development. In the previous draft (Sept. 8, 2011), the opening of Paragraph 1 reads: "No clearing, grading, or construction may be undertaken within the SB [Shoreline Buffer] for a public park development except as followings." There then followed two possibilities -- (1) changes made as part of a park development plan or master plan, or (2) "activities as prescribed below"

"In the Jan. 12, 2012 draft, the opening sentence now reads: "Minor clearing, grading or construction may be allowed within the Shoreline Buffer for a public park development with approval of the Administrator, pursuant to Section 4.1.3.8(2)(a) and only for the followings:" Paragraphs 1 and 2, which follow after this sentence, are the same.

The addition of the word "minor" in the opening paragraph means the entire section applies only to minor changes. What about major changes? The previous version covered both major changes, such as a revised site plan to be approved by the the City (Paragraph 1); and individual, minor changes or modifications (Paragraph 2), such as rerouting part of a trail or repairing a restroom roof. The Park District strongly recommends restoring the language in the opening paragraph of Sept. 8 draft because it covers both major and minor activities within the shoreline buffer. If the City's intent was to clarify the need for COBI approval of a park development plan, we suggest the following change in the first sentence in Paragraph 1: "The size and extent of proposed disturbed areas within the Shoreline Buffer have been determined as part of *an approved* park development plan or *approved* master park plan" [suggested changes in italics]

Further, the Park District does not understand the reference to Section 4.1.3.8(2)(a) in the opening sentence. Section 4.1.3.8(2) is entirely new language that looks like a catch-all for items related to Shoreline Buffer Reductions. Paragraph (a) under this heading says: "When the prescriptive buffer depth is reduced or altered, the applicant shall record a Notice on Title, or other similar document subject to the approval of the

Administrator, with the County Auditor prior to permit issuance." The Park District would appreciate clarification of how this requirement would apply to vegetation management in the Shoreline Buffer of a park.

- **Changes in Section 4.1.3.8 Regulations -- General Vegetation Alteration Standards.**

The Park District is very concerned about changes in Section 4.1.3.8 Regulations -- General Vegetation Alteration Standards. We appreciate the simplification and clarification of requirements in Paragraph 1.b. (Minor Pruning), particularly the reference to ANSI tree pruning standards, which Park District staff follow. However, we are very concerned about changes in Paragraph 1.a. (Approval Required for Minor Vegetation and Tree Removal). This paragraph now covers not only removal of vegetation and trees but also alteration of trees. Since there is already a requirement to follow ANSI tree pruning standards, prior approval for minor tree pruning is unnecessary.

Furthermore, requiring prior approval for pruning could make it very difficult for the Park District to carry out its responsibility for eliminating public safety hazards and maintaining healthy trees. For example, heavy rain, wind and sometimes snow frequently take down trees and break tree branches. The Park District is responsible for removing partially fallen trees and sharp limb stubs to protect public safety. In some cases, the health of trees with partial storm damage can be preserved only if the Park District acts quickly. That is one reason why we have a certified arborist on staff.

We therefore strongly urge deletion of this requirement for prior approval of minor pruning.

- **Environmental Impacts (4.1.2.) -- New requirements for replanting**

In the section on Environmental Impacts, City staff has substantially modified Paragraph 1 in General Regulations -- Re-vegetation Standards (4.1.2.5). The previous draft included a general requirement for revegetation with native species. The revised Paragraph 1 now includes detailed requirements for City approval of revegetation plans for all vegetation disturbance, including revegetation after the removal of invasive species [emphasis added]. The Park District believes these requirements are so burdensome that they are likely to be a deterrent to the removal of invasive species.

The new language is would apply to any alteration in existing vegetation; it makes not allowance for the selective removal of invasive species such as English ivy in areas where other native plants are already present. For example, in Blakely Harbor Park, ivy has been removed from trees and ground areas where ferns, salal, and evergreen and deciduous huckleberry were already growing. It would make no sense to require a revegetation plan for such areas.

As steward of public lands, we are committed to removing invasive species in all our parks, including shoreline parks. We also work to revegetate with native plants after the removal of invasive species. We are very fortunate in having been able to leverage our staff resources on such projects with a growing number of volunteers who have made significant progress in removing ivy, Scot's broom and butterfly bush from shoreline parks such as Fay Bainbridge, Gazzam and the Close property, Blakely Harbor, and Pritchard Park. We have revegetated or are working on revegetating all those areas with native plants.

In all these parks, areas infested with English ivy were significantly larger than 120 square feet. Under this new language, the Park District would have had to submit a detailed revegetation plan for these areas and receive City approval before starting on removal. In other words, not only would the Park District have had to expend resources to remove invasive species, it would also have had to prepare revegetation plans for all the areas where invasive species were to be removed, and then wait for COBI approval of those plans before actually starting work. If these requirements had been effect over the past four years, it's unlikely that many of these invasive species removal projects would have occurred.

The Park District strongly recommends striking all the added language in Paragraph 1 of 4.1.2.5. If necessary, a sentence could be added that says something like this: "Disturbed areas should be replanted with native plants, as listed by the Kitsap County Conservation District." If the goal is to encourage the removal of invasive species, which we strongly support, we believe the new requirements in the Jan. 12, 2012 draft will be counterproductive.

Thank you for your consideration of our comments.

Lee Cross
Park Commissioner
Bainbridge Island Metropolitan Park & Recreation District

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